IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN (01)
a.k.a. JAMES NORYIAN
DEHSHID NOURIAN (02)
a.k.a. DAVID NOURIAN
CHRISTOPHER RYDBERG (03)
MICHAEL TABA (07)

CRIMINAL NO. 3:17-cr-155-L

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT MICHAEL TABA (07)

TO THE HONORABLE JUDGE OF SAID COURT,

This Motion to Withdraw Counsel is brought by Jeffery King, attorney of record for Defendant MICHAEL TABA (07) and respectfully shows the following:

I. MOTION

- 1. Defendant Dr. Michael Taba was indicted on March 22, 2017 (ECF 1).
- 2. Undersigned counsel entered a Notice of Appearance (designation: retained) on October 5, 2022 (ECF 415).
- 3. The above-styled case was first tried on October 18, 2022 (ECF 463), and lasted only a few weeks before the Court granted a mistrial (ECF 512). The re-trial is scheduled to start on September 11, 2023 (ECF 513).
- 4. Defendant is unable to retain undersigned counsel for further representation under the representation agreement entered into by Defendant and counsel.

II. CONCLUSION

This motion is not being filed for the purpose of delay but so that Defendant is allowed enough time to find different representation or apply for CJA funding, whichever is appropriate for his financial circumstances.

FOR THE REASONS ABOVE, Counsel for Defendant Taba prays that the Court grant this motion for withdrawal of counsel.

Respectfully submitted,

/s/ Jeff King

Jeffery C. King

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CERTIFICATE OF CONFERENCE

I certify that I conferred with AUSA Ethan Womble and the government is unopposed to the granting of this motion to withdraw on the condition that no continuance is sought by Dr. Taba based on the withdrawal.

/s/ Jeff King Jeffery C. King

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via ECF system of the United States District Court upon all parties of record on $^{\text{May }23}$, 2023.

/s/ Jeff King Jeffery C. King